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September 14, 2010

VIA ECF AND FIRST CLASS MAIL

Hon. Douglas E. Arpert, U.S.M.J.
United States District Court, District of New Jersey
Clarkson S. Fisher U.S. Courthouse
402 E. State Street
Trenton, New Jersey 08608

Re: Charles Novins, Esq., P.C. et al. v. Kevin A. Cannon, et al.
U.S. District Court of NJ - Trenton
Civil Action: **09-CV-5354-AET-DEA**

Dear Judge Arpert:

Pursuant to Your Honor's August 16, 2010 Orders, enclosed please find the Affidavit of Services relating to Counterclaimant Lamb's motion for sanctions and motion to compel more specific answers to interrogatories. We respectfully request that Your Honor enter a judgment awarding costs and attorney's fees against the Plaintiffs and in favor of Counterclaimant Lamb. Both Dr. Lamb's sanctions motion and his motion to compel Plaintiffs to provide more specific answers were necessitated by Plaintiff's counsel's conduct. As a result of that conduct, Dr. Lamb incurred significant attorney's fees and expenses. We would like to avoid our client incurring any further unnecessary fees and expenses.

We thank Your Honor in advance for the Court's consideration of this request.

Respectfully submitted,

/s/ Dennis J. Duncan

Dennis J. Duncan

Encl.

cc: Charles Novins, Esq. (via ECF)
Joseph Manzo, Esq. (via ECF)